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Tel: 01908 443000  
[Company number: 07846971](tel:07846971)  
[VAT Number: GB 143 7800 18](tel:07846971)



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**Title:** SECTION 54 MODERN DAY SLAVERY &  
HUMAN TRAFFICKING ACT POLICY

**Type:** HR POLICY/PROCEDURE

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**Controlled Details:**

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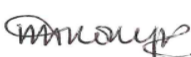
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**Signature:** 

**Date:** February 2020

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# MODERN DAY SLAVERY & HUMAN TRAFFICKING ACT POLICY (SECTION 54 OF THE MODERN SLAVERY ACT 2015)

## 1. PREAMBLE

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Human Trafficking is the second most profitable criminal enterprise worldwide, surpassed only by the illicit drugs industry. Once a trade based on legal ownership and ethnic distinctions, it has now moved into the informal economy based on global economic disparity.

Globalisation has increased international trade, reduced borders and reduced the price of travel. These influences have all helped to create 'Push' and 'Pull' factors that drive advantage of this environment, by offering cheap travel and promises of a better life abroad, only for the individual to end up in exploitative situations that they cannot escape.

TXM Plant Limited outlines in this policy its commitment to making Companywide a hostile place for those who traffic people into, within or out of the Company wide area.

### **Adherence to this policy will:**

- a) Ensure a consistent Companywide and professional approach is adopted across all business functions when dealing with matters of human trafficking.
- b) Reduce incidences of human trafficking and its impact through partnership working.
- c) Provide Police force with information on victims of human trafficking with the assurance of a quality focused investigation and appropriate support tailored to their individual needs for example; age, gender, ethnicity, sexual orientation and cultural or religious background.

## 2. POLICY STATEMENT

TXM Plant are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

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### 3. SCOPE

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee’s contract of employment and we may amend it at any time.

Slavery and human trafficking remain a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

Staff are expected to report concerns and management are expected to act upon them.

### 4. AIM

TXM Plant aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

TXM Plant is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of TXM’s own business or in any of TXM’s supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If employees believe that they have suffered any such treatment, they should inform the Assurance Director and HR Director immediately. If the matter is not remedied, employees should raise it formally using the Grievance Procedure which can be found on the intranet or can be obtained from the HR department.

### 5. OUR VISIONS AND VALUES

a) TXM Plant Limited, is committed to the principles of ‘A Safer Workplace for You’ our strategic priority is to achieve two clear objectives:

1. To make TXM Plant Limited safer
2. To make TXM Plant Limited feel safe

b) In doing this we will act in accordance with our Values of:

1. Integrity
2. Professionalism
3. Fairness and
4. Respect

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## 6. COMPANY DECISION MODEL

- a) The Company Decision Model is the primary decision-making model used in TXM Plant Limited. The Company Decision Model is inherently flexible and is applied to the development and review of this policy, procedure, strategy, project, plan or guidance through the HR Function and Board members.
- b) Understanding, using and measuring the Company Decision Model ensures that we can make ethical (please refer to Dignity at Work Policy) proportionate and defensible decisions in relation to policy, procedure, strategy, project, plan and guidance.
- c) The Board of Directors approve policy and the monitoring of all policies is with the TXM Plant Limited HR Director and the Assurance Director for all Compliance and Health & Safety aspects of the business.

### 6.1. Dignity at Work

- a) The Dignity at Work policy underpins every policy, procedure, decision and action in managing our business. The Dignity at Work is in everyday business considerations. This document has been developed with the Dignity at Work at the heart of ensuring consideration of the Company Principles and the standards of professional behaviour.
- b) Monitoring is carried out through audits and reviews by both the SHEQ and HR Teams. The Dignity at Work Policy goes hand in hand with our Equal Opportunities, Diversity and Inclusion Policy, Bribery and Corruption policy as well as our Employee Charters. Our Equal Opportunity monitoring takes place quarterly.

## 7. EMPLOYEE CONFIDENCE AND EQUALITY

- a) This document seeks to achieve the priority to make TXM Plant Limited feel safe by securing trust and confidence. Research identifies that this is achieved through delivering services which:
  1. Address individual needs and expectations
  2. Improves perceptions of order and Company cohesion
  3. Focus on Company priorities
  4. Demonstrate professionalism in all that we undertake
  5. Express and apply Company Values always
  6. Treat employees with dignity and equality always
  7. To be fair and consistent in all that we do and act with integrity always.
  8. Instil Confidence in the workforce and those outside the business that we deal with by being role models.
- b) This document recognises that some employees will be part of many communities defined by different characteristics. It is probable that all employees have common needs and expectations whiles at the same time everyone is different.

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c) Comprehensive analysis has identified a common need and expectation for employees in TXM Plant Limited to be:

1. Listened to
2. Kept informed
3. Protected and
4. Supported.

## 8. STANDARDS

### 8.1. Legal basis

One of the fundamental provisions of the Human Rights Act in Article 3 imposes a positive duty to 'prevent inhuman or degrading treatment'.

### 8.2. Suppliers and others

TXM Plant Limited will ensure that any partnership entered, supplier used or those who work on behalf or are Ambassadors of the Company or provide a service to TXM Plant Limited will be aware of our policy as well as those policies listed in clause 2.1.II and that they must demonstrate adherence to our standards, principles and values for them to be able to continue with their working relationship in any guise with TXM Plant Limited.

TXM Plant Limited will not use or work with any third party that does not adhere to the principles and standards of this policy.

## 9. MONITORING AND FEEDBACK

- a) TXM Plant Limited will ensure that all suppliers either have or adhere to the principles and standards of TXM Plant Limited Section 54 Modern Day Slavery Act Policy and in addition, TXM Plant Limited will make certain that all employees, consultants or those that work on behalf of TXM Plant Limited do indeed qualify and have entitlement to work in the United Kingdom, which needs to be evidenced by a number of legal original documentation and is always reviewed by a TXM Plant Limited employee who signs a declaration on copy documentation.
- b) TXM Plant Limited will ensure employees will be paid at prevailing rate of pay for any work activity undertaken.
- c) TXM Plant Limited through HR, SHEQ and Compliance functions will monitor and assess suppliers and recruitment process to make certain the Modern Slavery Act Policy is both implemented and adhered to.
- d) Annual data will be provided accordingly for those bodies that require evidence of compliance to this policy.

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## 10.VARIANCE

This policy does not form a contractual right to employees. The Company reserves the right to alter any of the policy terms at any time; adhering to any new legislation as required, without consultation. Employees will be notified of such changes in writing via letter, electronic communication or notice posted onto our Company notice boards.